

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WELL-COM ASSOCIATES, L.P.,

Plaintiff,

V.

HONEYWELL INTERNATIONAL, INC.,

Defendant.

Docket Number 05-10056-JLT

## **PLAINTIFF'S LIST OF POTENTIAL DEPONENTS**

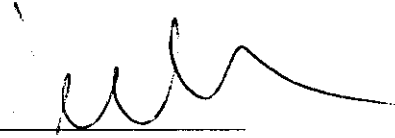
Pursuant to the Court's Discovery Order dated May 27, 2005, the plaintiff, Well-Com Associates, L.P. (Well-Com"), hereby submits the following list of potential deponents:

1. David Greene, former Sales Manager at the district sales office at 378 Commercial Street, Malden, MA ("the Site").
2. D. E. Greene (if different from David Greene) listed as the "dis, mgr.; bldg. Mat." at the sales office at the Site in 1962, according to company literature provided by Honeywell.
3. E. G. Mathey, listed as "mgr., pav. mat" at the sales office at the Site in 1962, according to company literature provided by Honeywell.
4. S.P. Clayton, Production Manager, Paving Materials Operations, for Barrett/Allied in 1961, according to a correspondence provided by Honeywell.
5. Patrick Henry, employee of the Plastics Division of Allied Chemical Corp. as of 1970, according to a correspondence provided by Honeywell.
6. W.E. Yankovitch, Allied employee to whose attention the DEQE NOR was directed in 1986.
7. Honeywell International, Inc. pursuant to Fed. R. Civ. P. 30(b)(6).

Well-Com reserves the right to supplement or amend this list.

Well-Com Associates, L.P.

By its attorneys,



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7/5/05

